

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

DECLARATION OF KEVIN RAYBURN

Pursuant to 28 U.S.C. § 1746, I, Kevin Rayburn, make the following declaration:

1.

My name is Kevin Rayburn. I am over the age of 21 years, and I am under no legal disability which would prevent me from giving this declaration. This declaration is based on my personal knowledge.

2.

I am the Deputy Elections Director and Deputy General Counsel for the Secretary of State of Georgia (“Secretary of State’s Office”). I have served in that

role since October of 2017. Previously, beginning on July 26, 2016, I was the Assistant General Counsel for the Secretary of State of Georgia.

3.

The Secretary of State's office does not possess or routinely maintain all the information identified in the Court's July 19, 2019 Order [Doc. 512].

Municipalities that conduct their own elections generally do so without the assistance of the Secretary of State's Office, and the Secretary of State's Office does not independently collect or maintain information as to how these elections are conducted and the voting methods used (i.e., whether Municipalities contract with a County to conduct elections by DRE, whether Municipalities conduct their own elections by DRE or another method, etc.).

4.

In order to provide as much of the information requested by the Court as possible, the Secretary of State's Office has endeavored to obtain said information from Georgia's Municipalities and Counties.

5.

The Secretary of State's Office contacted each election representatives from each County and requested the following information (1) whether the County will be conducting elections for any municipalities in the remainder of 2019 and, if so,

what cities and what offices are up for election (if known);¹ and (2) whether the County is aware of any Municipalities in its boundaries that will be holding elections in the remainder of 2019 that are not conducted by the County and, if so, what method of in-person voting the municipality will use (if known).

6.

In addition, the Secretary of State's Office directly contacted every Municipality which it knew to be conducting an election on its own in 2019 (that is, not conducted by its respective County) and requested information on the method of in-person voting that would be used.

7.

As of the time this Declaration was executed, the Secretary of State's Office had received responses to the requests described in paragraph 5 of this Declaration from 133 Counties. Of those counties, ten (10) counties do not have a municipality conducting an election in 2019.

8.

As of the time this Declaration was executed, the Secretary of State's Office had received information regarding each Municipality that the Secretary of State

¹ All municipal elections conducted by Counties are conducted on DREs.

knows to be conducting an election on its own in 2019, either from the Municipality directly or its respective County.

9.

All information obtained by the Secretary of State's Office pursuant to these efforts has been incorporated into the spreadsheet of upcoming elections included with this filing.

10.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of July, 2019.



KEVIN RAYBURN